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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

_____)
In the Matter of)
)
Telephone Number Portability)
)
_____)

CC Docket No. 95-116
DA 98-451

COMMENTS OF AT&T CORP.

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March 12, 1998

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SUMMARY

As the Commission has recognized, the failure of the former LNP Administrator in the Western, Southeast and West Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS") will prevent carriers in those regions from deploying Phase I of permanent local number portability ("PLNP") in compliance with the schedule established in the LNP Reconsideration Order. There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay.

The petitioners agree that Lockheed Martin IMS, the new LNPA for the affected regions, has committed to deliver an NPAC/SMS by May 11, 1998, and that implementation of PLNP Phase I can begin after approximately 30 days of intercompany testing. The parties' central dispute concerns the amount of time required to deploy PLNP following testing. As AT&T demonstrates, two weeks following inter-company testing should be ample time for carriers to complete Phase I.

The ILEC petitioners seek to justify unreasonably long periods for PLNP implementation by making wholly inapposite comparisons to the intervals established by the LNP Reconsideration Order. While that order addressed the full range of issues involved in carriers' implementation of PLNP and established a schedule accordingly, the Commission has ordered carriers to complete the vast majority of network modifications necessary for PLNP Phase I no later than March 31, 1998. Thus, the only aspects of LNP that will not be in place by the new NPAC/SMS "live" date are those that directly relate to carriers' ability to place "orders" for porting with the NPAC/SMS, and to download routing information

from that system to local SMSs. In light of the fact that the Commission's Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, the ILEC petitioners have long known the specifications to which they had to build in order to interface with the NPAC/SMS for these functions. In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. The record before the Commission strongly supports establishment of the following PLNP implementation deadlines for all carriers in the Western, Southeastern and West Coast regions:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

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COMMENTS OF AT&T CORP.

Pursuant to Sections 1.3 and 52.3(d) of the Commission's Rules, 47 C.F.R. §§ 1.3, 52.3(d), and the Public Notice released March 5, 1998, AT&T Corp. ("AT&T") hereby comments on the petitions for waiver of the Permanent Local Number Portability ("PLNP") Phase I implementation deadline of March 31, 1998 filed by GTE Service Corporation ("GTE"), MediaOne, Inc. ("MediaOne"), Pacific Bell ("Pacific"), and U S West Communications, Inc ("U S West").

AT&T is fully committed to fulfilling the Commission's LNP requirements, and has made every effort to ensure that number portability implementation -- both in its own network and throughout the industry -- complies with the schedule established by the Commission's rules. However, as the Commission recognized in the Phase I Waiver Order,¹ the failure of the former LNP Administrator ("LNPA") in the Western, Southeast and West

¹ Order, Telephone Number Portability, CC Docket No. 95-116, DA 98-152, released January 28, 1998 ("Phase I Waiver Order").

Coast regions to timely provide a stable Number Portability Administration Center/Service Management System (“NPAC/SMS”)² will prevent carriers in those regions from offering long-term portability in compliance with the schedule established in the LNP Reconsideration Order.³ There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay. Accordingly, AT&T will confine these comments to that issue.⁴

² The NPAC/SMS is

a hardware and software platform that will contain the database of information required to effect the porting of telephone numbers. In general, the Number Portability Administration Center Service Management System will receive customer information from both the old and new service providers, validate the information received, and download the new routing information when an “activate” message is received indicating that the customer has been physically connected to the new service provider's network.

Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 9, n.28 (“LNP Second Report and Order”).

³ First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, CC Docket No. 95-116, FCC 97-74, released March 11, 1997 (“LNP Reconsideration Order”).

⁴ The five petitions addressed in the Public Notice are only a portion of the Phase I waiver requests lodged with the Commission. Eight additional waivers were the subject of a Public Notice (DA 98-449) issued on March 4, 1998, which requested comments on the same schedule as the instant Notice. In order to ensure a complete record for the Commission's consideration of a new LNP implementation schedule in the affected regions, AT&T hereby incorporates its comments on the March 4th Public Notice into the instant pleading by reference.

I. AS THE COMMISSION HAS FOUND, PLNP IS "ESSENTIAL" TO LOCAL EXCHANGE COMPETITION

As a preliminary matter, it is important to note that with the exception of AT&T's pleading, all of the petitions addressed in the Public Notice were filed by incumbent LECs or their affiliates. The ILECs' claims should be carefully scrutinized, as any delay in PLNP implementation would be costless, if not beneficial, to those carriers, but will seriously impact their competitors. AT&T does not contend that the unavailability of the NPAC/SMS is attributable to any fault on the part of the ILEC petitioners.⁵ It is clear, however, that those carriers potentially can gain significant advantages by delaying the implementation of PLNP for as long as possible.

Congress recognized the importance of LNP to local competition by expressly requiring all LECs to provide that capability in § 251(b)(2), and by also including "full compliance" with the Commission's LNP rules as a component of the § 271 "checklist."⁶ Any delay in the implementation of PLNP potentially will injure nascent local

⁵ It is unclear, however, whether Pacific's inability to provide PLNP is in fact attributable to the unavailability of the NPAC/SMS, or to problems arising in its own network. As AT&T stated in its comments on Pacific's recent joint filing with Southwestern Bell Telephone Company, Pacific appears to have represented to the Commission both that it would be prepared to provide PLNP on time if a West Coast region NPAC/SMS were ready, and that it could not do so. See Comments of AT&T Corp., filed March 9, 1998, pp. 4-5, in SBC Companies Petition for Waiver Of Under 47 C.F.R. § 52.3(d) And Petition For Extension Of Time Of The Local Number Portability Phase I Implementation Deadline, CC Docket No. 95-116, NSD File No. L-98-16. In the event Pacific's inability to provide PLNP is not solely caused by the unavailability of an NPAC/SMS, then it should not be permitted to profit from any change to the Commission's PLNP schedule. See id., pp. 15-16.

⁶ See 47 U.S.C. § 271(c)(2)(B)(xi).

exchange competition. First, the Commission recognized in its First LNP Order that interim methods of local number portability (“ILNP”) can impair “the quality, reliability, or convenience of telecommunications services” offered by new entrants into local exchange markets.⁷ Accordingly, that order found that “[permanent] number portability is essential to ensure meaningful competition in the provision of local exchange services.”⁸

Second, CLECs in the affected regions already have incurred the expense of implementing PLNP in their own networks, and will soon begin to bear their share of the NPAC/SMS costs as well. Nevertheless, although CLECs will be paying for PLNP, until ILECs begin to support that capability their competitors will have no choice but to port numbers using ILNP -- and thus they will, in effect, be required to pay for both interim and permanent portability for each customer that ports a number. Third, when ILECs do begin to support PLNP, CLECs will bear the costs of converting customers from interim to permanent portability -- an expense they would not have borne for customers acquired after the Commission’s PLNP implementation deadline, but for the delay of that capability.

In contrast to CLECs, ILECs potentially benefit by delaying PLNP. Most importantly, their CLEC competitors will be handicapped in the quality of service they can offer to customers porting their numbers using ILNP methods. In addition, ILECs will obtain additional payments from CLECs for ILNP services provided to existing CLEC

⁷ Telephone Number Portability, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, released July 2, 1996, ¶ 110 (“First LNP Order”).

⁸ Id., ¶ 28.

customers after the date on which PLNP should have been available, payments for ILNP services provided to new CLEC customers that port their numbers after the original PLNP implementation date, and payments to convert such new CLEC customers from ILNP to PLNP.

II. AN NPAC/SMS WILL BE AVAILABLE FOR INTERCOMPANY TESTING IN EACH OF THE AFFECTED REGIONS ON MAY 11, 1998

The LLCs of all three affected regions recently replaced Perot Systems with Lockheed Martin IMS as LNPA. As the Commission knows, Lockheed was selected as LNPA for the four other LNP regions, and that company has developed and implemented a workable NPAC/SMS in those areas. Lockheed has committed to deliver an NPAC/SMS for the Western, Southeast and West Coast regions that is ready for intercompany testing on May 11, 1998.⁹ The petitioners do not dispute that May 11th is planned as the NPAC/SMS “live” date, and their proposed schedules all are based on this starting point, as intercompany testing cannot proceed until this milestone is achieved.

III. THE COMMISSION SHOULD ADOPT AT&T’S PROPOSED PLNP IMPLEMENTATION SCHEDULE FOR PHASE I MSAs

Although all four of the parties that offer a proposed implementation schedule begin from the same May 11, 1998 NPAC/SMS “live” date, they do not agree on a date by which Phase I PLNP deployment should be completed.¹⁰ Two dates are most relevant to the Commission’s consideration of a new Phase I LNP schedule: (i) the date by

⁹ See AT&T Corp. Petition for Waiver, filed March 2, 1998, p. 5 in Telephone Number Portability, CC Docket No. 95-116.

¹⁰ MediaOne does not propose a revised schedule for LNP implementation.

which any necessary intercompany testing will be completed, and (ii) the date implementation will be completed. The positions of the parties are as follows:

| Carrier | End Testing | End Phase I |
|---------------------|--------------------|--------------------|
| AT&T | 6/11/98 | 6/26/98 |
| GTE | 6/14/98 | 8/13/98 |
| Pacific Bell | 6/11/98 | 7/20/98 |
| U S West | no date specified | 7/17/98 |

Testing. All of the petitioners propose that testing will last approximately 30 days, and all save U S West agree that testing can commence on the day after Lockheed's delivery of an NPAC/SMS.¹¹ U S West, however, proposes to begin testing on May 18th, one week after the NPAC/SMS "live" date, on the grounds that "[t]he week between May 11, 1998 and May 18, 1998 is reserved for returning the NPAC/SMS to a live network-ready status (versus a test status)."¹² There is simply no basis for such a delay, as the other petitions make clear. Lockheed has committed to deliver an NPAC/SMS that is, in U S West's phrasing, "network ready." There is simply no basis for the assertion that any carrier requires an additional week to prepare that system for testing. Accordingly, the Commission should order carriers to commence testing on May 12, 1998 (or the day following the NPAC/SMS "live" date in the relevant region, in the event there is some delay

¹¹ See AT&T, p. 5; GTE, p. 9 (table proposing to begin testing on 5/12/98 and complete it on 6/14/98, a total of 32 days); Pacific, pp. 19, 20 (proposing a "30 day cooperative testing period"); U S West Attachment 1, p. 5 (chart showing 30-day testing intervals).

¹² U S West Attachment 1, p. 5.

in Lockheed's performance), and to complete that testing on June 11, 1998 (or 30 days after testing commences).

U S West proposes to perform its testing in serial fashion in each of its three internal "regions," vestiges of the predecessor Bell companies that combined to form that carrier fourteen years ago. U S West claims that it cannot perform testing in a more efficient, parallel fashion due to the continued existence of three distinct sets of systems and a shortage of employees with the requisite specialized skills.¹³ U S West's position is inherently contradictory, however. If U S West in fact possesses three distinct sets of systems in three separate regions, then that company must have separate personnel and other resources devoted to each region's operations, each expert on the systems within their region. These region-specific resources presumably could be combined with testing-specific resources to perform simultaneous testing. U S West's petition does not explore this or other alternatives to serial testing.

Phase I End Date. The commenters agree that PLNP implementation can begin the day following the completion of testing.¹⁴ They do not agree, however, on when that process should be completed. The ILECs propose to permit as much as two months (GTE's estimate) from the close of testing to full deployment of PLNP. These figures are

¹³ Id., pp. 4-5.

¹⁴ See AT&T, pp. 5-6; GTE, p. 9 (chart depicting testing ending 6/14/98, and implementation beginning 6/15/98); Pacific, p. 20 ("Pacific will begin to accept and process orders for live porting transactions in the Los Angeles MSA approximately 1 work day after the conclusion of intercompany testing."). U S West does not state precisely when it proposes to begin implementation, stating only that testing will last 30 days, and giving an end date for implementation.

plainly inflated, and should be rejected. Two weeks following inter-company testing should be ample time for carriers to implement Phase I LNP.

The two-week interval AT&T proposes is more than adequate to permit carriers to do any last-minute clean-ups to their own systems and processes, and to prepare themselves to accept orders for PLNP. This is especially so when one considers that “implementation” of PLNP means nothing more than being prepared to accept and fulfill orders for that service. Carriers have agreed that conversion of customers from ILNP to PLNP will be conducted on a separate timetable. Conversion should occur within 90 days following the availability of both PLNP and an operational interface to permit CLECs to order conversions from interim portability methods to PLNP.

The ILECs’ petitions seek to justify their unreasonably long periods for PLNP implementation by comparing them to the intervals in which the LNP Reconsideration Order allowed carriers to phase-in PLNP.¹⁵ This comparison is simply

¹⁵ Indeed, GTE’s petition actually proposes longer intervals for PLNP implementation that it proposed in its reports to the California LNP Task Force. In those reports, GTE stated that its implementation intervals for Phases I through III would be as follows:

Phase I: 2/16/98-3/30/98 (43 days)
Phase II: 4/9/98-5/15/98 (36 days)
Phase III: beginning and ending on 6/30/98 (1 day)

In contrast, GTE’s petition proposes the following intervals:

Phase I: 6/15/98-8/13/98 (59 days)
Phase II: not less than 50 days after Phase I
Phase III: not less than 30 days after Phase II

(footnote continued on next page)

inapposite. According to the express terms of the Phase I Waiver Order, carriers in the Western, Southeast, and West Coast regions should not have delayed their implementation of LNP in any respect other than those that “specifically relate to the availability of the vendor-supplied [NPAC/SMS].”¹⁶ The LNP Reconsideration Order addressed the full range of issues involved in carriers’ implementation of PLNP, and established a schedule accordingly. In stark contrast, as the Phase I Waiver Order makes plain, the vast majority of network modifications required to implement PLNP must be completed for Phase I MSAs no later than March 31, 1998 -- more than a month before the NPAC/SMS “live” date in the affected regions.¹⁷

Thus, the only aspects of LNP that have yet to be finalized are those that directly relate to carriers' ability to place “orders” for porting with the NPAC/SMS, and to download routing information from that system to local SMSs. In light of the fact that the Commission’s Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, the ILEC petitioners have long known the specifications to which they had to build in order to interface with the NPAC/SMS for these

(footnote continued from previous page)

See GTE, Reports to the California LNP Task Force, 11/20/97 and 1/13/98, attached as Exhibit 1.

¹⁶ Phase I Waiver Order, ¶ 8.

¹⁷ See Id.

functions.¹⁸ In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

In addition, by AT&T's proposed June 26th deadline, the industry will already have gained valuable experience and knowledge from implementing Phases I and II in the other four LNP regions, as the LNP Reconsideration Order requires LNP implementation in Phase II MSAs no later than May 15, 1998. Even those carriers that do not participate in Phases I and II of LNP implementation in other regions will benefit from the experiences vendors (many of which work for more than one carrier), regulators, and other carriers will gain in working with the Lockheed NPAC/SMS, and significant knowledge transfers can be expected through industry fora such as the LLCs, as well as through informal contacts.

The Commission should mandate completion of PLNP implementation in Phase I MSAs in the Western, Southeast and West Coast regions by June 26, 1998 -- or two weeks following the completion of intercompany testing in the event Lockheed is unable to meet the current May 11, 1998 NPAC/SMS "live" date.

¹⁸ See Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 62 ("Second LNP Order") ("We adopt the NANC's recommendation that the local number portability administrators and any entity directly connecting to the Number Portability Administration Center Service Management System use the Number Portability Administration Center Service Management System Interoperable Interface Specification.... The NANC IIS will serve as an industry standard for use in developing and maintaining the Number Portability Administration Center Service Management System interfaces in each of the seven Number Portability Administration Center regions.") (emphasis added).

IV. THE COMMISSION SHOULD USE THE INSTANT PROCEEDING TO COMPLETE ITS ADJUSTMENT OF THE LNP TIMETABLE IN THE AFFECTED REGIONS

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. It would be an inefficient use of the already heavily taxed resources of both the Commission's staff and carriers to conduct repeated rounds of comments on subsequent LNP Phases that inevitably would present precisely the same issues as the instant petitions. Once the Phase I schedule is adjusted, establishing a timetable for the remaining Phases is a straightforward matter.

After intercompany testing of the Lockheed NPAC/SMS is completed for Phase I MSAs in each region, there is no valid reason for that testing to be repeated in subsequent MSAs. Further, as the Phase I Waiver Order required for Phase I MSAs, carriers in the Western, Southeast, and West Coast regions should be continuing their efforts to complete all necessary modifications and upgrades in their own networks to prepare themselves to offer PLNP in subsequent Phases according to the schedule established in the LNP Reconsideration Order. Thus, after completion of Phase I, carriers approaching Phase II should need no more than two weeks to complete implementation in those MSAs -- just as they required two weeks following the completion of testing to complete Phase I. Similarly, Phase III can, and should, be completed two weeks after completion of Phase II. If the Commission adopts AT&T's proposal, it can return to the LNP Reconsideration Order's schedule beginning in Phase IV.

CONCLUSION

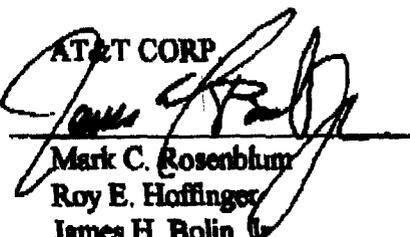
For the reasons stated above, the Commission should establish the following deadlines for Permanent Local Number Portability implementation in the Western, Southeastern and West Coast regions by all carriers:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

Respectfully submitted,

By

AT&T CORP


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March 12, 1998

AT&T Corp.

12

3/12/98

EXHIBIT 1

REPORT TO THE CALIFORNIA LNP TASK FORCE
GTE LNP DEPLOYMENT - PHASE I
 Updated 11/20/97

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase I, Los Angeles (MSA-1), beginning February 16, 1998 and completing March 31, 1998.

GTE Switch Clusters And Component Sites
By Proposed Deployment Ranking

| CLUSTER NAME / GTE RANKING | SITE NAMES | SWITCH TYPE | ACO | CLLI CODE |
|--|-------------------|----------------|-----|-------------|
| SANTA MONICA / WEST L.A. CLUSTER Ranking: 1 Date: 2/16/98 | BEL AIR | GTD-5 | 706 | BELRCAXF47K |
| | BUNDY - SM | SESS | 717 | WLANCAXHDS1 |
| | BUNDY - WLA | GTD-5 | 719 | WLANCAXH2J |
| | MALIBU | GTD-5 | 746 | MALBCAXG45A |
| | MAR VISTA | GTD-5 | 748 | CLCYCAXG39K |
| | MARINA DEL REY | SESS | 793 | PDRYCAXF2A |
| | PACIFIC PALISADES | GTD-5 | 762 | PCPLCAXF45K |
| | SANTA MONICA | SESS | 778 | SNMNCAXGDS0 |
| | SUNSET | DMS-100 | 727 | SNMNCAXJ1K |
| | UNIVERSITY | DMS-100 | 789 | WLANCAXJDS0 |
| | WEST LOS ANGELES | SESS | 717 | WLANCAXFDS1 |
| | WESTWOOD | GTD-5 | 792 | WLANCAXG47G |
| | ZUMA | GTD-5 | 798 | MALBCAXF45K |
| COVINA CLUSTER Ranking: 2 Date: 2/23/98 | AZUSA | DMS-100 | 411 | AZURCAXF33K |
| | BALDWIN PARK | DMS-100 | 412 | BLPKCAXF33K |
| | COVINA | GTD-5 | 421 | COVNCAXF33M |
| | GLENORA | GTD-5 | 422 | GLNDCAXF33M |
| | LA PUENTE | SESS | 431 | LAPNCAXGDS1 |
| | MAPLEGROVE | SESS | 433 | LAPNCAXLDS0 |
| | MONROVIA | GTD-5 | 441 | MNRVCAXG35K |
| | ROWLAND | SESS | 432 | LAPNCAXFDS1 |
| | ROWLAND | GTD-5 | 432 | LAPNCAXF31K |
| | SIERRA MADRE | GTD-5 | 442 | SRMDCAXF35K |

ALL DATES AND DEPLOYMENT RANKINGS AS SHOWN IN THIS REPORT ARE PROPOSED. THEY ARE PROVIDED BY GTE TO THE TASK FORCE FOR PRELIMINARY PURPOSES ONLY AND ARE SUBJECT TO CHANGE. THE DATES INDICATE WHEN GTE WILL ACCEPT SERVICE ORDERS.

DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

GTE LNP DEPLOYMENT - PHASE I
 Updated 11/20/97

(continued from previous page)

| CLUSTER NAME / GTE RANKING | SITE NAMES | SWITCH TYPE | ACO | CLLJ CODE |
|--|-----------------|----------------|-----|-------------|
| LONG BEACH CLUSTER Ranking: 3 Date: 2/13/98 | ALAMITOS | GTD-5 | 801 | SLBHCAXF43J |
| | CLARK | GTD-5 | 885 | LNBHCAXMD60 |
| | LONG BEACH MAIN | SESS | 843 | LNBHCAXFD60 |
| | M. L. KING | DMS-100 | 825 | LNBHCAXLDS0 |
| | MARKET | GTD-5 | 845 | LNBHCAXH42P |
| | STADIUM | IAESS | 836 | LNBHCAXS42E |
| | TERMINO | SESS | 884 | LNBHCAXT43K |
| | UPTOWN | SESS | 855 | LNBHCAXGD60 |
| POMONA CLUSTER Ranking: 4 Date: 3/02/98 | CLAREMONT | GTD-5 | 556 | CLMTCAXF62G |
| | DIAMOND BAR | GTD-5 | 588 | DMBRCAXF66M |
| | LA VERNE | GTD-5 | 557 | LVRNCAXF59H |
| | POMONA | GTD-5 | 558 | POMNCAXF62E |
| | SAN DIMAS | GTD-5 | 559 | SNDMCAXF59C |
| | WALNUT | SESS | 560 | WLNTCAXFDS0 |
| LANCASTER CLUSTER Ranking: 5 Date: 3/02/98 | ANTELOPE | SESS | 765 | LNCSCAXFDS0 |
| | LANCASTER | GTD-5 | 769 | LNCSCAXG94K |
| | QUARTZ HILL | GTD-5 | 766 | QZHLCAXF94K |
| BELLFLOWER CLUSTER Ranking: 6 Date: 3/09/98 | ALONDRA | SESS | 858 | NRWLCAXGDS0 |
| | ARTESIA | DMS-100 | 803 | ARTSCAXF66S |
| | BELLFLOWER | GTD-5 | 809 | BLFLCAXF66K |
| | DOWNEY | GTD-5 | 820 | DWNYCAXF66K |
| | FLORENCE | GTD-5 | 819 | BLORCAXF92K |
| | IMPERIAL | GTD-5 | 821 | DWNYCAXG80G |
| | NORWALK | GTD-5 | 857 | NRWLCAXF92S |
| REDONDO CLUSTER Ranking: 7 Date: 3/16/98 | DEL AMO | GTD-5 | 876 | TRNCCAXF54K |
| | EL NIDO | GTD-5 | 871 | RDBHCAXF37K |
| | MANHATTAN BEACH | DMS-100 | 873 | MNBHCAXF54K |
| | PALOS VERDES | GTD-5 | 872 | TRNCCAXG97J |
| | REDONDO | GTD-5 | 874 | HRBHCAXA37K |
| | ROLLING HILLS | GTD-5 | 875 | RLHLCAXF79L |

GTE LNP DEPLOYMENT - PHASE I

ALL DATES AND DEPLOYMENT RANKINGS AS SHOWN IN THIS REPORT ARE PROPOSED. THEY ARE PROVIDED BY GTE TO THE TASK FORCE FOR PRELIMINARY PURPOSES ONLY AND ARE SUBJECT TO CHANGE. THE DATES INDICATE WHEN GTE WILL ACCEPT SERVICE ORDERS.

DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

Updated 11/20/97

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| CLUSTER NAME / GTE RANKING | SITE NAMES | SWITCH TYPE | ACO | CLLI CODE |
|--|-----------------|----------------|-----|-------------|
| SAN FERNANDO CLUSTER Ranking: 8 Date: 3/23/98 | GRANADA HILLS | GTD-5 | 704 | GRHLCAXF36J |
| | PACOMA | GTD-5 | 733 | PACMCAXF89K |
| | SAN FERNANDO | GTD-5 | 732 | SNFNCAXG36K |
| | SEPULVEDA | SESS | 703 | SPLVCAXFDSI |
| | SEPULVEDA | GTD-5 | 703 | SPLVCAXF89K |
| | SUNLAND/TUJUNGA | GTD-5 | 735 | SNLDCAXF35K |
| | SYLMAR | GTD-5 | 734 | SYLMCAXF86K |
| WHITTIER CLUSTER Ranking: 9 Date: 3/30/98 | LA HABRA | SESS | 861 | LAHBCAXFDS0 |
| | PICO | GTD-5 | 863 | WHTRCAXJ69L |
| | RIO HONDO | SESS | 862 | PCRVCAXFDS0 |
| | VALLEY VIEW | GTD-5 | 864 | WHTRCAXJ84K |
| | WHITTIER SOUTH | GTD-5 | 865 | WHTRCAXF69M |
| | WHITWOOD | GTD-5 | 866 | WHTRCAXG84C |

ALL DATES AND DEPLOYMENT RANKINGS AS SHOWN IN THIS REPORT ARE PROPOSED. THEY ARE PROVIDED BY GTE TO THE TASK FORCE FOR PRELIMINARY PURPOSES ONLY AND ARE SUBJECT TO CHANGE. THE DATES INDICATE WHEN GTE WILL ACCEPT SERVICE ORDERS.

DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

REPORT TO THE CALIFORNIA LNP TASK FORCE

GTE LNP DEPLOYMENT - PHASE 2
 Updated 1/13/98

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase 2, Riverside / San Bernardino County (MSA-10), beginning April 1, 1998 and completing May 15, 1998.

**GTE Switch Clusters And Component Sites
 By Proposed Deployment Ranking**

| CLUSTER NAME / GTE RANKING | SITE NAMES | SWITCH TYPE | CLLI CODE |
|---|-------------------------|----------------------|----------------------------|
| ONTARIO CLUSTER Ranking: 1 Proposed Port Date: 4/9/98 | CHINO | GTD-5 BU | CHNOCAXP62J |
| | CUCAMONGA | GTD-5 BU | CCMNCAXP98K |
| | CUCAMONGA | SESS BU | CCMNCAXPDS1 |
| | ETIWANDA | GTD-5 BU | ETWNCAXP89L |
| | LOS SERRANOS | GTD-5 BU | LSSRCAXP59J |
| | ONTARIO AIRPORT | DMS100 BU | ONTRCAXM080 |
| | ONTARIO MAIN | DMS100 BU | ONTRCAXP98K |
| | ONTARIO SOUTH UPLAND | GTD-5 BU GTD-5 BU | ONTRCAXG96L UPLDCAXP98G |
| BANNING CLUSTER Ranking: 2 Proposed Port Date: 4/16/98 | BANNING | GTD-5 BU | BNNGCAXP84L |
| | BEAUBONT | GTD-5 BU | BUMTCAXP84L |
| | CALIMESA | GTD-5 BU | CLMSCAXP79G |
| | MENTONE | GTD-5 BU | MENTCAXP79X |
| | YUCAIPA | DMS100 BU | YUCPCAXP79M |
| ELSINORE CLUSTER Ranking: 3 Proposed Port Date: 4/23/98 | EDGEMONT | GTD-5 BU | EDMTCAXP65H |
| | ELSINORE GRAND | DMS100 BU | ELSNCAXP67K |
| | ELSINORE MAIN | GTD-5 BU | ELSNCAXP67N |
| | HEMET | GTD-5 BU | HEMTCAXP65C |
| | HOMELAND | DMS100 BU | HMLDCAXP92H |
| | MURRIETA | GTD-5 BU | MURTCAXP67J |
| | FERRIS | GTD-5 BU | PERSCAXP65X |
| | QUAIL VALLEY | GTD-5 BU | QUVYCAXP24K |
| | RANCHO CALIF | GTD-5 BU | RNCACAXP67X |
| | SAN JACINTO | GTD-5 BU | SNJCCAXP65F |
| | SUN CITY | GTD-5 BU | SNCYCAXP67K |
| | SUNNYMEAD | GTD-5 BU | SNYMCAXP92F |
| | VALLE VISTA | GTD-5 BU | VLVSCAXP92X |

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DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

GTE LNP DEPLOYMENT - PHASE 2
 Updated 1/13/98

(continued from previous page)

| CLUSTER NAME/ GTE RANKING | SITE NAMES | SWITCH TYPE | CLI CODES |
|--|------------------|----------------|--------------|
| PALM SPRINGS CLUSTER Ranking: 4 Proposed Port Date: 5/1/98 | COACHELLA | GTD-3 BU | CCHLCAXP39L |
| | DESERT HOT SPGS | GTD-5 BU | DHSPCAXP66X |
| | INDIO | SESS BU | INDICAXGDS0 |
| | LA QUINTA | GTD-5 BU | LAQNCAXG56L |
| | PALM DESERT | GTD-5 BU | PLDSCAXF34A |
| | PALMS SPRINGS | SESS BU | PLSPCAXGDS0 |
| | PALM SPGS EAST | GTD-5 BU | PLSPCAXG32G |
| | RANCHO MERAGE | SESS BU | RNMGCAXGFD50 |
| | THOUSAND PALMS | GTD-5 BU | THPLCAXGFD50 |
| | TWENTYNINE PALMS | GTD-5 BU | TWPLCAXF36K |
| | WASHINGTON ST. | GTD-5 BU | BRDNCAXF34G |
| | YUCCA VALLEY | GTD-5 BU | YCVYCAWG36X |
| SAN BERNARDINO CLUSTER Ranking: 5 Proposed Port Date: 5/8/98 | ARROWHEAD | GTD-5 BU | ARHDCAXF33H |
| | CRESTLINE | GTD-5 BU | CRNLCAXF33X |
| | LOMA LINDA | GTD-5 BU | LMLNCAXF79L |
| | MARSHALL | GTD-5 BU | SNBRCAWG88K |
| | MUSCOY | GTD-5 BU | MSCYCAXF88K |
| | NORTON AFB | DMS-100 BU | SNBRCAXND50 |
| | REDLANDS | DMS-100 BU | RDLDCAXF79K |
| | SAN BERNARDINO | GTD-5 BU | SNBRCAWK88E |
| | WATERMAN | SESS BU | SNBRCAJLD50 |
| VICTORVILLE/ BLYTHE CLUSTER Ranking: 6 Proposed Port Date: 5/15/98 | ADELANTO | DMS100-BU | ADLNCAXFDS0 |
| | APPLE VALLEY | DMS100-BU | APVYCAXF2AJ |
| | BARSTOW | SESS-BU | BRSWCAXFDS0 |
| | BIG BEAR LAKE | SESS-BU | BBLKCAXFDS0 |
| | BLYTHE | DMS100/2-AT | BLYTCAXF92K |
| | EARP | DMS-RSLE | EARPCAXC665 |
| | HAVASU LANDING | DMS-RSLE | HVSUCAXFRS1 |
| | HESPERIA | DMS100-BU | HSPRCAXFDS0 |
| | LOST LAKE | DMS-RSLE | LSLKCAXC664 |
| | RIDGECREST | SESS-BU | RDGCAXGDS0 |
| | VICTORVILLE | DMS100-BU | VTVLCAXAD50 |

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DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

REPORT TO THE CALIFORNIA LNP TASK FORCE



LNP DEPLOYMENT - PHASE 3

Updated 1/13/98

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase 3, Orange County (MSA-15) & San Francisco County (MSA-29), beginning and completing on June 30, 1998.

**GTE Switch Clusters And Component Sites
By Proposed Deployment Ranking**

| CLUSTER NAME / GTE RANKING | SITE NAME | SWITCH TYPE | CLL CODE |
|---|------------------|------------------------|-----------------|
| ORANGE / SAN FRANCISCO CLUSTER Proposed Port Date: 6/30/98 | BUSHARD | GTD-5 | HNBHCAJG96A |
| | HUNTINGTON BCH | GTD-5 | HNBHCAJG96L |
| | LAGUNA BEACH | GTD-5 | LGBHCAJF49K |
| | SLATER | GTD-5 | HNBHCAJF84C |
| | WARNER | DMS-100 | HNBHCAJL84S |
| | WESTMINSTER | SESS BU | WNHSCAJF50 |
| | NOVATO | GTD-5 | NOVTCAJF50 |

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DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 12th day of March, 1998, a copy of the foregoing "Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.



Terri Yannotta

March 12, 1998

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